

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:21-CV-463-JRG
)	
SAMSUNG ELECTRONICS CO., LTD.,)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS AMERICA,)	
INC., SAMSUNG SEMICONDUCTOR,)	
INC.,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST INC.'S
OPPOSITION TO DEFENDANTS' MOTION TO BIFURCATE
WILLFULNESS (DKT. 404)**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Opposition to Defendants’ Motion to Bifurcate Willfulness. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct excerpted copy of Samsung’s Seventh Supplemental Objections and Responses to Netlist’s First Set of Interrogatories (Nos. 1, 2, 4, 5, 7, 9), dated December 22, 2022.

3. Attached as **Exhibit 2** is a true and correct copy of Netlist’s Second Notice of Deposition of Defendants Pursuant to Rule 30(b)(6), dated September 27, 2022.

4. Attached as **Exhibit 3** is a true and correct copy of an email from Katherine Reardon to Annita Zhong and Yanan Zhao, dated November 30, 2022.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of the deposition transcript of Junseon Yoon conducted on December 21, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 26, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby
Jason G. Sheasby